

District Court for the United States of America
In the District Court for Pennsylvania at Philadelphia

Reverend Juan-Jose': Brookins,
Trust Protector for the Ministerial Indigenous
Nations Trust (M.I.N.T.), Standing In Propria
Persona Sui Juris Pursuant to FRCP Rule
17(E),

Plaintiff,

-against-

GREGORY S. LEIRO, Prosecuting Attorney
for the Commonwealth of Pennsylvania
Department of State in his personal individual
capacity,

Defendant.

Civil Case No. 23-cv-002418(JMY)

**PLAINTIFF'S AFFIDAVIT
IN SUPPORT OF
MOTION FOR DEFAULT JUDGMENT
PURSUANT TO FRCP RULE 55(a)(b)(1)**

November 16, 2023

VERIFICATION

Connecticut State }
Fairfield County } ss:
}

Plaintiff, Reverend Juan-Jose': Brookins, hereby declares as follows:

1. I am the Plaintiff in this action.
2. This action was commenced pursuant to the Common Law tort for Defamation and Slander on June 23, 2023, and Defendant, GREGORY S. LEIRO, Esq, was duly served on August 25, 2023. (See Exhibit "A").
3. The time for the Defendant to answer or otherwise move with respect to the Plaintiff's verified Civil Complaint herein has expired.
4. Defendant, GREGORY S. LEIRO, Esq, has not filed an appearance or otherwise moved with respect to the verified Complaint, and the time for Defendant to answer or otherwise move has not been extended.

5. Therefore the Defendant is now in open and active default and that default has been notified to the Clerk of Court in the Court Record in the following manner:

- No notice of appearance on behalf of Defendants from any Attorney admitted to practice in this Court has been filed; and
- No answer to the Summons and Complaint has been filed with the Court within the required time frame under the Federal Rules of Civil Procedure (FRCP) from any of the Defendants named herein.

WHEREFORE, Plaintiff respectfully requests that a default judgment be entered in favor of Plaintiff and against Defendant GREGORY S. LEIRO, Esq, in accordance with FRCP Rules 55(a)(b)(1) by the Clerk of the Court.

I, Reverend Juan-Jose': Brookins hereby declare under penalty of perjury that the foregoing is true, correct and complete to the best of my knowledge, information and belief, that the Defendant named herein is in open and active default of the Rules of the Court and a judgment of default against him is justly due to Plaintiff, and that Plaintiff is entitled to such other and further relief for the Defendant's default as the Court deems just and proper.

Dated: November 16, 2023.
Connecticut State, Fairfield County.

By: Rev. Juan-Jose': Brookins
Reverend Juan-Jose': Brookins
46 Gramatan Avenue, #19
Mount Vernon, New York state [10550-9998]
Non-Domestic

Affirmed and Ascribed Before Me This
17th Day of November 16, 2023.

[Signature]
Notary
My Commission Expires



Long Island Timely Process Servers Inc.
117 Paul's Path # 204
Coram, New York 11727

August 23, 2023

United States District Court
601 Market Street
Philadelphia, Pennsylvania 19106

My name is Thomas Thompson owner of Long Island Timely Process Servers Inc., I am including additional copy to be stamped and returned by in the self address envelope. I appreciate any and all assistance with this matter.

Long Island Timely Process Servers Inc.
Thomas Thompson CEO

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 23-cv-02418

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* **GREGORY S. LEIRO, ESQ.**
was received by me on *(date)* **July 31, 2023**

☐ I personally served the summons on the individual at *(place)*

on *(date)* ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)*

, a person of suitable age and discretion who resides there,
on *(date)* , and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)*

, who is

designated by law to accept service of process on behalf of *(name of organization)*

on *(date)* ; or

☐ I returned the summons unexecuted because

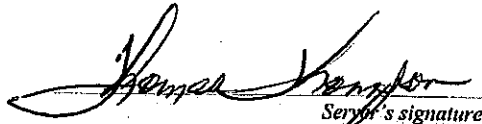
; or

☒ Other *(specify)*: I, Thomas Thompson mailed Summons to GREGORY S. LEIRO, ESQ
July 14, 2023

My fees are \$ for travel and \$ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: **August 22, 2023**


Server's signature

Thomas Thompson (Process Server)

Printed name and title

117 Paul's Path # 204 Coram, NY 11727

Server's address

Additional information regarding attempted service, etc:

It was certified mail to:
GREGORY S. LIERO, ESQ.
P.O. BOX 69521
2601 NORTH THIRD STREET
HARRISBURG, PENNSYLVANIA
17106-9521

I received signature confirmation signed by K. Nash on
July 19, 2023
Signature verification of receipt attached

AO 399 (01-09) Waiver of the Service of Summons

UNITED STATES DISTRICT COURT

for the
Eastern District of Pennsylvania ☒

Reverend Juan-Jose': Brookins

Plaintiff

v.

Gregory S. Leiro, Esq.

Defendant

Civil Action No. 23-cv-02418

WAIVER OF THE SERVICE OF SUMMONS

To:

(Name of the plaintiff's attorney or unrepresented plaintiff)

I have received your request to waive service of a summons in this action along with a copy of the complaint, two copies of this waiver form, and a prepaid means of returning one signed copy of the form to you.

I, or the entity I represent, agree to save the expense of serving a summons and complaint in this case.

I understand that I, or the entity I represent, will keep all defenses or objections to the lawsuit, the court's jurisdiction, and the venue of the action, but that I waive any objections to the absence of a summons or of service.

I also understand that I, or the entity I represent, must file and serve an answer or a motion under Rule 12 within 60 days from , the date when this request was sent (or 90 days if it was sent outside the United States). If I fail to do so, a default judgment will be entered against me or the entity I represent.

Date:

Signature of the attorney or unrepresented party

Printed name of party waiving service of summons

Printed name

Address

E-mail address

Telephone number

Duty to Avoid Unnecessary Expenses of Serving a Summons

Rule 4 of the Federal Rules of Civil Procedure requires certain defendants to cooperate in saving unnecessary expenses of serving a summons and complaint. A defendant who is located in the United States and who fails to return a signed waiver of service requested by a plaintiff located in the United States will be required to pay the expenses of service, unless the defendant shows good cause for the failure.

"Good cause" does *not* include a belief that the lawsuit is groundless, or that it has been brought in an improper venue, or that the court has no jurisdiction over this matter or over the defendant or the defendant's property.

If the waiver is signed and returned, you can still make these and all other defenses and objections, but you cannot object to the absence of a summons or of service.

If you waive service, then you must, within the time specified on the waiver form, serve an answer or a motion under Rule 12 on the plaintiff and file a copy with the court. By signing and returning the waiver form, you are allowed more time to respond than if a summons had been served.

Signature of Attorney
Or Unrepresented Party

Print

Address

Email address

Telephone Number

District Court for the United States of America
In the District for Pennsylvania State at Philadelphia

Reverend Juan-Jose : Brookins,
*Trust Protector for the Ministerial Indigenous
Nations Trust (M.I.N.T.), Standing In Propria
Persona, Sui Juris Pursuant to FRCP RULE
17(E).*

Plaintiff,

-against-

GREGORY S. LIERO, ESQ., Prosecuting
Attorney for the Commonwealth of
Pennsylvania Department of State in his
personal, individual capacity,

Defendant.

Civil Case No.23-cv-02418(____)

CIVIL COMPLAINT

Jury Trial Demanded

NOTICE OF A LAWSUIT AND REQUEST TO WAIVE SERVICE OF SUMMONS

TO: Gregroy S. Leiro, Esq.
P.O. Box 69521
2601 North Third Street
Harrisburg, Pennsylvania 17106-9521

Why are you getting this?

A lawsuit has been filed against you, or the entity you represent, in this Court under the Case Number shown above. A copy of the Complaint is attached.

This is not a Summons, or an Official Notice from the Court. It is a request that, to avoid expenses, you waive formal service of a Summons by signing and returning the enclosed waiver. To avoid these expenses, you must return the signed waiver within thirty (30) days from the date shown below, which is the date this Notice was sent. Two copies of the waiver form are enclosed, along with a stamped, self-addressed envelope or other prepaid means for returning one copy. You may keep the other copy.

What happens next?

If you return the signed waiver, I will file it with the Court. The action will then proceed as if you had been served on the date the waiver is filed, but no Summons will be served on you

and you will have sixty (60) days from the date this Notice is sent (See the date below) to answer the Complaint.

If you do not return the signed waiver, I will file it with the Court. The action will then proceed as if you had been served on the date the waiver is filed, but no Summons will be served on you and you will have sixty (60) days from the date of this Notice (See the date below) to answer the Complaint.

If you do not return the signed waiver within the time indicated, I will arrange to have the Summons and Complaint served on you, and I will ask the Court to require you, or the entity you represent, to pay the expenses of making service.

Please read the enclosed statement about the duty to avoid unnecessary expenses.

I certify that this request is being sent to you on the date below:

Date: July 7, 2023.

Respectfully submitted,

Rev. Juan-Jose: Brookins
Signature of Plaintiff

Reverend Juan-Jose: Brookins
Print

46 Gramatan Avenue, #19

Mailing Address

Mount Vernon, New York State

Near Postal Zone [10550] Non-Domestic


jawambi@yahoo.com

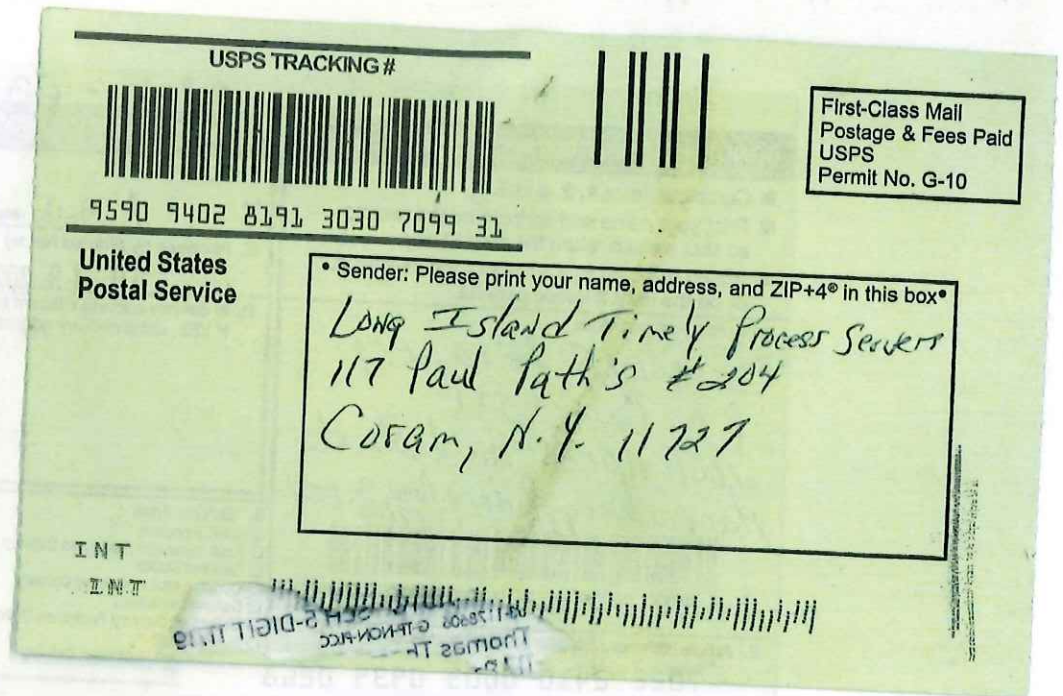
email address

(203) 449-8391

Telephone Number

23-cv-02418

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee</p> <p>X <i>K. Naik</i></p>	
<p>1. Article Addressed to:</p> <p><i>Gregory S. Leiro, Esq</i> <i>P.O. Box 69521</i> <i>2601 North Third Street</i> <i>Harrisburg, Pennsylvania 17106-7521</i></p>  <p>9590 9402 8191 3030 7099 31</p>		<p>B. Received by (Printed Name) JUL 19 2023</p> <p>C. Date of Delivery JUL 18 2023</p>	
<p>2. Article Number (Transfer from service label)</p> <p>7022 2410 0003 0939 0268</p>		<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p> <p>If YES, enter delivery address below:</p>	
<p>3. Service Type</p> <p><input type="checkbox"/> Adult Signature</p> <p><input type="checkbox"/> Adult Signature Restricted Delivery</p> <p><input type="checkbox"/> Certified Mail®</p> <p><input type="checkbox"/> Certified Mail Restricted Delivery</p> <p><input type="checkbox"/> Collect on Delivery</p> <p><input type="checkbox"/> Collect on Delivery Restricted Delivery</p> <p><input type="checkbox"/> Insured Mail</p> <p><input type="checkbox"/> Mail Restricted Delivery</p>		<p><input type="checkbox"/> Priority Mail Express®</p> <p><input type="checkbox"/> Registered Mail™</p> <p><input type="checkbox"/> Registered Mail Restricted Delivery</p> <p><input type="checkbox"/> Signature Confirmation™</p> <p><input type="checkbox"/> Signature Confirmation Restricted Delivery</p>	
<p>PS Form 3811, July 2020 PSN 7530-02-000-9053</p>		<p>Domestic Return Receipt</p>	



Long Island Timely Process Server Inc.
117 Paul's Path #204
Coram, N.Y. 11727

U.S.M.S.
X-RAY

Retail
U.S. POSTAGE PAID
FCM LG ENV
CORAM, NY 11727
AUG 23, 2023
\$1.83
R2304M109564-4
19106
RDC 99



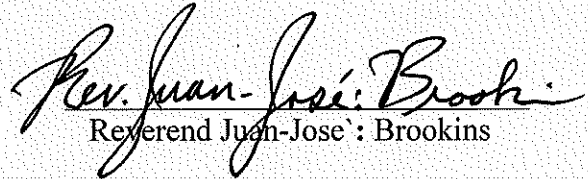
United States District Court
601 Market Street
Philadelphia, Pennsylvania 19106

CERTIFICATE OF SERVICE

I, Reverend Juan-Jose : Brookins, hereby certify that on November 16, 2023, I sent a true and correct copy of the foregoing Motion for Default Judgment via first class United States Post Office mail to the following:

Gregory S. Leiro, Esq.
P.O. Box 69521
2601 North Third Street
Harrisburg, Pennsylvania 19106-9521

Ashely Mastrangelo
Clerk of Court
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, PA 19106


Reverend Juan-Jose : Brookins

Rev. Juan-José: Brookins
46 Gramatan Avenue, #19
Mount Vernon, New York near [10550]
non-Domestic

CERTIFIED MAIL



7018 0680 0001 6184 4015

Retail



RDC 99



19106

U.S. POSTAGE PA
FCM LG ENV
BRIDGEPORT, CT
NOV 17, 2023

\$9.73

*R2304M115654-19

Ashley Mastrangelo
Clerk of Court
James A. Byrne Courthouse
601 Market Street
Philadelphia, PA 19106-9521

U.S.M.S.
X-RAY

